

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

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In the Matter of

MAY 11 2004

Amendment of Section 73.202(b)
 Table of Allotments
 FM Broadcast Stations
 (Memphis and Arlington, Tennessee,
 and St. Florian, Alabama)

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MB Docket No. _____
 RM - _____

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

To: Office of the Secretary
 Attn: Assistant Chief, Audio Division
 Media Bureau

PETITION FOR RULE MAKING

Clear Channel Broadcasting Licenses, Inc. ("Clear Channel"), licensee of WEGR(FM), Memphis, Tennessee, by its counsel, hereby submits this Petition for Rule Making, which proposes to (i) delete Channel 274C1 at Memphis, Tennessee and allot Channel 274C1 to Arlington, Tennessee as that community's first local service; and (ii) modify the reference point of the vacant allotment on Channel 274A at St. Florian, Alabama. If this Petition is granted, Clear Channel will file an application for Channel 274C1 at Arlington and construct the facilities as authorized. The following table summarizes the changes requested in this Petition:

City	Channel	
	Existing	Proposed
Memphis, Tennessee	246C1, 259C, 274C1, 283C1, 290C	246C1, 259C, 283C1, 290C
Arlington, Tennessee	---	274C1

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I. Station WEGR(FM), Memphis to Arlington, Tennessee

A. Technical Analysis

1. As demonstrated in the Technical Exhibit, Channel 274C1 can be allotted to Arlington at WEGR's current coordinates of 35-16-33 North Latitude, 89-46-38 West Longitude consistent with Section 73.207 of the Commission's Rules with respect to all existing and proposed domestic allotments and facilities, except, as discussed in paragraph 6 herein, for the vacant allotment on Channel 274A at St. Florian, Alabama. *See* Figure 1. A 70 dBu signal can be provided to Arlington from the current reference coordinates. *See* Figure 3. The facilities of WEGR will not be relocated. However, Clear Channel desires to increase the power and antenna height of WEGR from its current maximum of 87 kW at 288 meters to the Class C1 maximum of 100 kW and 299 meters, which will result in a predicted net gain in area of 986 sq. km. and in population of 15,721 persons within the WEGR 60 dBu contour. *See* Figure 2. Because WEGR's facilities will not be relocated, there is no 60 dBu loss area associated with this proposal. *See* Technical Narrative.

B. Change in Community of License

2. Clear Channel desires to change the community of license of Station WEGR from Memphis to Arlington under the guidelines set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recons. granted in part*, 5 FCC Rcd 7094 (1990). There, the Commission stated that a station may change its community of license without subjecting the license to other expressions of interest if (1) the proposed allotment is mutually exclusive with the current allotment; (2) the current community of license will not be deprived of its only local service; and (3) the proposed arrangement of allotments is preferred under the Commission's allotment priorities. These criteria are met here. First, the proposed use of Channel 274C1 at Arlington is

mutually exclusive with the current use of Channel 274C1 at Memphis. *See* Figure 1. Second, Memphis will not be deprived of its only local service because it will continue to be served by 9 FM stations and 9 AM stations. Third, the provision of a first local service at Arlington (2000 U.S. Census population 2,657) under Priority 3 will result in a preferential arrangement of allotments over the retention of a nineteenth local service at Memphis (2000 U.S. Census population 649,845) under Priority 4. *See Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

3. Station WEGR is currently licensed at Memphis, which is located within the Memphis Urbanized Area, and WEGR as it is currently sited covers 100% of the Memphis Urbanized Area. Arlington is not located in an Urbanized Area, and the proposed 70 dBu contour of WEGR will cover 100% of the Memphis Urbanized Area. Therefore, this relocation does not implicate the Commission's policy regarding the migration of stations into urban areas, especially considering that WEGR is moving out of the Memphis Urbanized Area. *See, e.g., Dayton, Incline Village and Reno, Nevada*, 15 FCC Rcd 22461, 22462 (2000); *St. Maries, Idaho and Spokane, Washington*, 14 FCC Rcd 17012, 17019 (1999); *Boulder and Lafayette, Colorado*, 12 FCC Rcd 583, 584 (1997); *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995) ("*Headland*"); *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*"). Nevertheless, a *Tuck* showing is provided.

4. Under *Tuck*, in making the determination whether to award an urbanized community a first local service preference, the Commission will consider (1) the extent to which the station will provide service to the entire Urbanized Area, (2) the relative populations and proximity of the suburban and central city, and, most importantly, (3) the independence of the suburban community. *Tuck*, 3 FCC Rcd at 5377-78. In this case, from the proposed transmitter

site, WEGR would place a 70 dBu contour over 100% of the Memphis Urbanized Area. Arlington's population (2000 U.S. Census 2,657) is less than 1% of that of Memphis (2000 U.S. Census 649,845) and Arlington is located 39.2 kilometers from Memphis. These figures are similar to those of other suburban communities granted a first local preference. *See e.g., Park City, Montana*, DA 04-285 (2004) (Park City's population is less than 1% of that of Billings, and Park City is located 21 miles from Billings); *Ada, Newcastle and Watonga, Oklahoma*, 11 FCC Rcd 16896, 16899 (1996) (Newcastle's population is less than 1% of that of Oklahoma City, and Newcastle is located 15 miles from Oklahoma City). Nevertheless, the Commission has repeatedly stated that these factors are less important than evidence of independence. *See Headland*, 10 FCC Rcd at 10355. The following analysis of the eight *Tuck* factors demonstrates the independence of Arlington from Memphis.

(1) ***Extent to which the residents of Arlington work in Arlington.*** According to 2000 Census figures, 362 of the 1,369 employed individuals in Arlington, or 26%, work at their place of residence. *See* Exhibit 2. This percentage compares favorably with other independent communities. *See, e.g., Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876 (2001), *application for review pending* (11.3% of working-age residents worked in community); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996) (13% of Gilbert's working population actually worked in Gilbert).

(2) ***Newspapers and other media that cover Arlington's local needs and interests.*** The *East Shelby Review* is a weekly newspaper that covers a number of communities in East Shelby County, including the community of Arlington. The *Arlington Connection* is a quarterly publication of the Town of Arlington that provides

the residents of Arlington with local coverage. Therefore, the residents of Arlington do not have to rely on the media in Memphis. *See Exhibit 2.*

(3) *Community leaders and residents perceive Arlington as being separate from Memphis.* The Town of Arlington was founded in the 1830's as Haysville, named after the original landowner, Samuel Jackson Hays. In 1883 the name of the town was changed to Arlington, after the Arlington National Cemetery in Virginia, at the suggestion of Captain Henry Pitman. Arlington received its charter from the State of Tennessee in December 1900. The Town of Arlington maintains a website at <www.townofarlington.org>, where it states that the residents of Arlington "do not have a real need to visit the bigger city; the necessities of life could be found within its own Town square." Further, "Arlington offers excellent public schools, community activities, and commercial amenities all with a strong sense of small-town charm and character." *See Exhibit 2.*

(4) *Arlington has its own local government and elected officials.* Arlington is governed by a Mayor and Board of Aldermen, the members of which are elected to four-year terms. The Mayor and Board of Aldermen meet in the Town Hall chambers on the first Monday of each month. Arlington citizens serve on a number of boards and committees which advise the Mayor and the Board of Aldermen or carry out other specified functions in accordance with town ordinances. These boards and committees include the Beautification Committee, the Board of Zoning Appeals, the Communications Committee, the Design Review Committee, the Finance Committee, the Fire, Health, and Safety Committee, the Industrial Development Board, the Parks and Recreation

Committee, the Planning Commission, and the Public Works and Sewer Committee. See Exhibit 2.

(5) *Arlington has one zip code and its own phone book.* The zip code assigned to Arlington is 38002, and the U.S. Postal Service operates three offices in Arlington. BellSouth publishes the Bartlett-Raleigh-Arlington phone book which combines yellow and white page directories for the community of Arlington. See Exhibit 2.

(6) *Arlington has its own commercial establishments and health facilities.* Arlington is home to the Arlington Chamber of Commerce and a variety of businesses and commercial establishments. The Arlington Industrial Park is home to many of Arlington's largest employers and companies. Many of the industries in Arlington chose to locate themselves here many years ago and have further developed and enhanced their presence throughout the years, making Arlington an attractive location for growing industry and business. Some of the members of Arlington's industrial community include, Allen Steel Products, Carrier Concrete Company, Chem-Trainer Industries, Delta Industrial Coatings, Jimmy Dean Foods, Machining Technology Group, Plasma Coatings of Tennessee, Rich Products, River City Materials, and Russell Performance Products. A number of local businesses identify with the community by using "Arlington" in their name, including Arlington Automotive, Arlington Community Bank, Arlington Engine Center, Arlington Florist, Arlington Dental Center, Arlington Family Chiropractors, Arlington Florist, and Arlington Self Storage. See Exhibit 2.

Health care is provided to the community of Arlington by a number of sole practitioners. Arlington is also home to a number of religious organizations, including

the Arlington Assembly of God, the Arlington Church of Christ, the Arlington Presbyterian Church, the Arlington United Methodist Church, and the Christ Lutheran Church. *See Exhibit 2.*

(7) ***Arlington is a separate and distinct advertising market from Memphis.*** The *East Shelby Review* provides the businesses of Arlington with a place to advertise to the residents of Arlington without relying on the Memphis advertising market.

(8) ***Arlington has its own schools, library, police protection and fire protection.*** Arlington students currently attend three public schools, Arlington Elementary School, Arlington Middle School, and Bolton High School, which are all part of the Shelby County School system. When the newly constructed Arlington High School opens in August 2004, students living in Arlington will have the opportunity to attend school from kindergarten through high school graduation right in their home town. The Arlington Branch of the Shelby County Public Library system serves the growing community of Arlington. *See Exhibit 2.*

The Arlington Fire Department is a publicly funded department that covers the entire Arlington area. It is currently home to nine full-time firefighters and twenty-one reserves. The Shelby County Sheriff's Office operates a substation in Arlington. The substation is home to the department's Patrol Division which includes Uniform Patrol, School Resource Officers, and Crime Prevention. With 80 Patrol Officers, 9 Sergeants, 3 Lieutenants, 1 Captain, 1 Inspector-Commander and 2 Civilian employees, the Arlington Patrol Division is one of the largest divisions of the Shelby County Sheriff's Office. The Arlington Public Works Department provides the residents of Arlington with quality public services on a timely, consistent, and cost-effective basis. The Public Works staff

maintains the municipal sewer system and operates the wastewater treatment facility. *See* Exhibit 2.

5. Arlington is clearly independent of Memphis and therefore deserving of a first local service. As demonstrated above, Arlington satisfies all of the independent community indicia required by *Tuck*.

II. Vacant Allotment on Channel 274A at St. Florian, Alabama

6. In order to allot Channel 274C1 at Arlington, Tennessee it will be necessary to modify the site at which the vacant allotment on Channel 274A at St. Florian, Alabama is assigned. Channel 274A is currently allotted to St. Florian at the coordinates 34-57-8 North Latitude, 87-39-30 West Longitude. As demonstrated in the Technical Exhibit, the coordinates of Channel 274A can be modified to 34-50-12 North Latitude, 87-37-27 West Longitude consistent with Section 73.207 of the Commission's Rules with respect to all existing and proposed domestic allotments and facilities. *See* Figure 5. A 70 dBu signal can be provided to St. Florian from the proposed reference coordinates. *See* Figure 4. The proposed site for Channel 274A is four kilometers from St. Florian, which is closer to St. Florian than the current site.

7. Clear Channel desires to modify the site of Channel 274A at St. Florian consistent with the *Notice of Proposed Rule Making* released by the Commission on March 26, 2004 (the "*Notice*"). *See* DA 04-780. The *Notice*, among other things, proposed the reservation of Channel 274A at St. Florian, Alabama for noncommercial educational use ("NCE"), pursuant to a Petition for Rule Making filed by American Family Association (the "American Family Petition"). The *Notice* also stated that a party may file comments identifying a site at which a proposed reserved channel could be assigned with facilities fully equivalent to the proposed

reserved allotment. The site proposed by Clear Channel for the allotment of Channel 274A is fully equivalent to the proposed reserved allotment. *See* Figure 4. The party filing comments also must demonstrate that, at the alternative site, the reserved channel will still provide a first and/or second NCE radio service to at least 10 percent of the population within the 60 dBu contour of the proposed station. As demonstrated in Figure 6, the coordinates proposed by Clear Channel will permit Channel 274A to provide service to 133,399 persons within the 60 dBu contour of the proposed station, which is 7,141 more persons than the 126,255 persons served at the original allotment site. *See* American Family Petition. Of the 133,339 persons served at Clear Channel's proposed site, 20,089, or 15%, will receive a second NCE radio service, which is more than the 16,810, or 13.3%, identified at the original allotment site.¹ *See* American Family Petition.

8. Clear Channel is simultaneously filing comments to the *Notice*, in which it proposes this modification to the current reference point of the St. Florian allotment. However, in order to promptly provide a first local service to Arlington, Tennessee, Clear Channel requests that the Commission modify the site of vacant Channel 274A at St. Florian, Alabama in this proceeding. If the St. Florian NCE proposal is adopted first, this proceeding can acknowledge that prior action.

III. CONCLUSION

For the foregoing reasons the Commission should delete Channel 274C1 at Memphis, Tennessee and allot Channel 274C1 at Arlington, Tennessee as that community's first local service. In order to allot Channel 274C1 at Arlington, Tennessee the Commission should modify the site at which the vacant allotment on Channel 274A at St. Florian, Alabama is assigned. This

¹ At the current St. Florian coordinates and at the coordinates proposed by Clear Channel, no persons will receive a first NCE radio service.

will allow Station WEGR to increase its facilities and serve more people. Further, by modifying the reference site of the St. Florian allotment, more persons will be provided a second NCE service. Clear Channel reiterates that if this Petition is granted, it will file an application for Channel 274C1 at Arlington and construct the facilities as authorized. The Commission should promptly issue a Notice of Proposed Rule Making as described herein.

Respectfully submitted,

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LICENSES, INC.

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May, 11 2004

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TECHNICAL EXHIBIT

TECHNICAL EXHIBIT

PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS

MEMPHIS, TENNESSEE
ARLINGTON, TENNESSEE

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station WEGR (FM), Memphis, Tennessee, in support of a Petition for Rule Making to amend 47 C.F.R. Section 73.202(b) to reallocate channel 274C1 at Memphis, Tennessee to channel 274C1 at Arlington, Tennessee, and to modify the license of WEGR (FM) to specify operation on channel 274C1 at Arlington, Tennessee.

As the requested change is mutually exclusive with the channel's current allotment, Petitioner invokes the provisions of 47 C.F.R. Section 1.420(i).

The following is a summary of the merits of this reallocation proposal:

- The community of Arlington, Tennessee (2000 Census population 2,657 persons) will be provided with its first local aural transmission service.
- The community of Memphis, Tennessee (2000 Census population 649,845 persons) will continue to have local aural service from eighteen (18) radio stations¹.
- The proposed channel 274C1 allotment site at Arlington, Tennessee satisfies the Commission's allocations spacing rules.²

¹ See Table 1 herein.

² The proposed allotment reference coordinates are 35° 16' 33" North, 89° 46' 38" West, the same coordinates as the currently licensed site. This will require a minor change in the coordinates of a proposed allotment at St. Florian. See this Exhibit under the heading "Compliance With FCC Rules" for details on allocations considerations

- No site change is necessary to provide 70 dBu service to all of Arlington, Tennessee. Therefore, there is no 60 dBu gain or loss area associated with this proposal³.
- This proposal eliminates a short spacing (compliant under §73.215 but short under §73.207) to the allotment on channel 274A to St. Florian, Alabama, permitting a power increase for WEGR (FM) from the current maximum of 87 kW at 288 meters to the C1 class maximum of 100 kW and 299 meters height above average terrain and a corresponding increase in population and area.
- The alternate site proposed herein for the channel 274A NCE allotment at St. Florian, Alabama provides increased second aural NCE service within the 60 dBu contour⁴.

with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

³ See *Figure 2*.

⁴ As compared with the original allotment proposal. Please see further discussion in this narrative.

Table of Figures Accompanying this Exhibit

- Figure 1 WEGR(FM) Channel 274C1 Allocations Spacing
Study at Arlington, TN

- Figure 2 WEGR(FM) Channel 274C1 60 dBu Service,
Present and Proposed

- Figure 3 WEGR(FM) 274C1 70 dBu Service to Arlington,
TN

- Figure 4 Channel 274 Class A 70 dBu Service to St.
Florian, Alabama

- Figure 5 Channel 274A Allocations Spacing Study at St.
Florian, Alabama

- Figure 6 Second 60 dBu NCE Service Provided by the
Alternate 274A Allotment Site at St. Florian
proposed herein.

Proposed Change in the FM Table of Allotments

Memphis, Tennessee is located in Shelby County, Tennessee, and has a 2000 U.S. Census population of 649,845 persons. Under this proposal, Memphis will continue to receive local aural radio service from the following stations:

Table 1: Radio Stations Licensed to Memphis, TN

Calls	Suffix	Owner	AM	FM
WMC	FM	Infinity Broadcasting	0	99.7
WKNO	FM	Mid-South Public Communications Foundation	0	91.1
WLOK	AM	Gilliam Communications Inc	1340	0
WMC	AM	Infinity Broadcasting	790	0
WREC	AM	Clear Channel Communications	600	0
WQOX	FM	Memphis City Schools	0	88.5
		Memphis/Shelby County Public Library & Info		
WYPL	FM	Center	0	89.3
WRVR	FM	Entercom	0	104.5
WUMR	FM	University of Memphis	0	91.7

Channel 274C1, Memphis, Tennessee and Arlington, Tennessee

WJCE	AM	Entercom	680	0
WHRK	FM	Clear Channel Communications	0	97.1
WDIA	AM	Clear Channel Communications	1070	0
KWAM	AM	Clear Channel Communications	990	0
WBBP	AM	Bountiful Blessings	1480	0
WEVL	FM	Southern Communication Volunteers Inc	0	89.9
WHBQ	AM	Flinn Broadcasting Corporation	560	0
WGSF	AM	Flinn Broadcasting Corporation	1030	0
WGKX	FM	Citadel Broadcasting Corp	0	105.9

Arlington, Tennessee is located in Shelby County, Tennessee, and has a 2000 U.S. Census population of 2,657 persons. Arlington has no local FM or AM aural broadcast service and, therefore, Petitioner's proposal would bring a first local aural broadcast service to Arlington.

Accordingly, Petitioner requests modification of the FM allocation table as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Memphis, TN	246C1, 259C, 274C1, 283C1, 290C	246C1, 259C, 283C1, 290C
Arlington, TN	-	274C1

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 274C1 at Arlington, Tennessee. The allotment reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments, except for:

- (1) The existing channel 274C1 allotment at Memphis, Tennessee, for which this proposal is a mutually exclusive substitute.
- (2) A class A allotment on channel 247 at St. Florian, Alabama, to which this proposal would be short-spaced⁵. Accordingly, we propose an alternate site for channel 247A at St. Florian, which will provide

⁵ As is the currently licensed WEGR (FM) operation on channel 274C1. This instant application seeks to remove this short spacing.

the requisite 70 dBu service to all (100%) of St. Florian, Alabama, and increased second aural NCE service within the 60 dBu contour. See *Figure 4*, and further discussion in the next section of this narrative.

Operation from the channel 274C1 reference site will provide the requisite city grade (70 dBu) signal to all of Arlington, Tennessee⁶. *Figure 3* is a map which was developed using the 2000 U.S. Census Topologically Integrated Geographic Encoding and Referencing (TIGER) Line files which depicts the city grade coverage (70 dBu) contours based on class C1 facilities (ERP 100 kW/HAAT 299 meters) at the proposed allotment site. As shown, all (100%) of Arlington is located within the 70 dBu City Grade contour. Arlington is located 10.7 kilometers from the proposed WEGR channel 274C1 allotment site.

St. Florian Allotment

In MM Docket 04-80, rulemaking 10875, a new NCE allotment on a non-reserved channel (channel 274A) was proposed at St. Florian, Alabama. In the petition for that allotment, a showing was made that the allotment would serve 126,258 persons within its 60 dBu contour, and that 16,810 of those, or 13.31% of the population receiving 60 dBu service, would receive either a first or second NCE service⁷ from the St. Florian proposal.

An alternate allotment site for the NCE operation on channel 274A at St. Florian is proposed herein. This allotment site would provide 60 dBu service to 133,399 persons, 20,089 of whom would receive either first or second aural NCE service⁸. This represents 15% of the total population within the 60 dBu contour. Thus, the channel 274A NCE allotment site for St. Florian proposed herein provides a suitable (and arguably preferable) site for this new service.

Operation from the proposed Channel 274A allotment reference site will provide the requisite city grade (70

⁶ SEE *Figure 3* herein.

⁷ See FM-MB 03-366, filed on behalf of American Family Association and received by the FCC on November 19, 2003.

⁸ See *Figure 6* herein.

dBu) signal to all of St. Florian, Alabama. *Figure 4* depicts the city grade coverage (70 dBu) contour for channel 274A at St. Florian, Alabama. *Figure 5* is a channel spacing study for channel 274A at the proposed alternate site which demonstrates that this site is fully spaced with regard to all present and proposed operations and allotments. The proposed site for channel 274A is located 4 kilometers distant from the center of St. Florian, Alabama.

Urbanized Area Considerations

The WEGR(FM) 274C1 70 dBu contour currently encompasses 100% of the Memphis Urbanized Area, and will continue to do so under this proposal⁹.

60 dBu Gain and Loss Areas

A new allotment requires a fully spaced transmitter site. The current WEGR (FM) channel 274C1 site is short spaced to the proposed channel 274A allotment at St. Florian under §73.207. This proposal, in conjunction with the recommended site change for the allotment at St. Florian, will permit full class C1 operation for WEGR (FM), resulting in a power increase from the currently authorized 87 kW, to full class C1 power of 100 kW, and a height increase from the currently authorized (and maximum under §73.215) 288 meters above average terrain, to the C1 class maximum of 299 meters above average terrain.

As a result of the ability to achieve maximum facilities, an additional 15,721 persons will receive service within the WEGR (FM) 60 dBu contour. Service will be provided to 986 square kilometers not currently receiving service from this station. Since this is a straightforward power increase without a site change, there is no corresponding loss area.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of 47 C.F.R. Section 73.313,

⁹ SEE *Figure 3*.

except that, in accordance with current FCC practice, uniform terrain was assumed in all directions.

Population and Area

The population within the FM primary service contour (1 mV/m) was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

Channel 274C1 can be reallocated from Memphis, Tennessee to channel 274C1 at Arlington, Tennessee, in compliance with all applicable Commission rules. The community of Arlington, Tennessee would be provided with a first local aural transmission service, and the community of Memphis, Tennessee will continue to have local aural service. No service will be lost in any underserved area¹⁰ and no new underserved areas will be created as a result of this proposal. New service proposed for St. Florian, Alabama, providing first and second aural NCE service, can also still be accommodated. Therefore, Petitioner requests the reallocation of channel 274C1 from Memphis, Tennessee to Arlington, Tennessee, and the modification of the license of WEGR (FM) to specify operation on channel 274C1 at Arlington, Tennessee be granted.

Respectfully submitted,



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¹⁰ Defined as an area receiving service from less than five aural broadcast services. There is no 60 dBu loss area associated with this proposal.

April 27, 2004

Figure 1: WEGR(FM) Channel 274C1 Allocations Spacing Study at Arlington, TN

WEGR-FM, Arlington, TN							
REFERENCE				DISPLAY DATES			
35 16 33 N		CLASS = C1		DATA		04-24-04	
89 46 38 W		Current Spacings		SEARCH		04-26-04	
----- Channel 274 - 102.7 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	
WEGR	LIC-N 274C1	Memphis	TN 0.00	0.0	245.0	-245.00 ¹	
ALLO	USE 274C1	Memphis	TN 11.64	205.4	245.0	-233.36	
Coordinates updated from LIC record BLH3596							
ALLO	VAC 274A	St. Florian	AL 196.47	100.0	200.0	-3.53 ²	
ALLO	VAC 274A	St. Florian	AL 202.37	103.4	200.0	2.37 ³	
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.							
ALLO	VAC 275C3	Saltillo	MS 147.28	131.1	144.0	3.28	
ALLO	USE 276C2	Jackson	TN 89.29	73.5	79.0	10.29	
KTRQ	LIC-N 272C2	Colt	AR 91.38	254.6	79.0	12.38	
WMXXFM	LIC-Z 276C2	Jackson	TN 94.62	71.3	79.0	15.62	
WMXXFM	CP 276C2	Jackson	TN 94.62	71.3	79.0	15.62	
ALLO	USE 271A	Sardis	MS 97.15	184.3	75.0	22.15	
WZDQ	LIC 272A	Humboldt	TN 99.05	56.6	75.0	24.05	
ALLO	USE 272A	Humboldt	TN 99.05	56.6	75.0	24.05	
Coordinates updated from LIC record BLH821112AP							
ALLO	USE 272C2	Colt	AR 103.69	251.1	79.0	24.69	
KBUD	LIC-N 271A	Sardis	MS 99.84	179.3	75.0	24.84	
WKZU	LIC 272A	Ripley	MS 105.89	126.2	75.0	30.89	
ALLO	USE 272A	Ripley	MS 106.45	126.6	75.0	31.45	
Coordinates updated from LIC record BLH790517AC							
ALLO	USE 276C3	Helena	AR 111.09	223.4	76.0	35.09	
KFFAFM	LIC-N 276C3	Helena	AR 113.83	223.3	76.0	37.83	
KEZSFM	LIC 275C1	Cape Girardeau	MO 237.19	4.6	177.0	60.19	
ALLO	USE 275C1	Cape Girardeau	MO 237.19	4.6	177.0	60.19	
Coordinates updated from LIC record BLH870501KC							
ALLO	USE 273C1	Pegram	TN 239.54	63.6	177.0	62.54	
ALLO	RSV 273C1	Pegram	TN 248.96	62.1	177.0	71.96	
KASU	LIC-D 220C1	Jonesboro	AR 106.11	310.4	34.0	72.11	
ALLO	USE 221A	University	MS 94.28	166.3	22.0	72.28	
WQZQFM	LIC-N 273C1	Pegram	TN 250.36	62.4	177.0	73.36	
ALLO	USE 273A	Cabot	AR 206.53	261.3	133.0	73.53	
KARNFM	LIC 273A	Cabot	AR 207.21	259.7	133.0	74.21	
ALLO	USE 274A	Marion	KY 274.90	33.1	200.0	74.90	

¹ Original channel, for which this proposal is a mutually exclusive substitute.

² Proposed allotment at St. Florian, Alabama, to which this proposal is short spaced, see Engineering Exhibit for discussion.

³ Alternate site proposed for channel 274A at St. Florian, Alabama, which is fully spaced to this instant proposal, and provides 70 dBu service to 100% of St. Florian, Alabama.

Figure 2: WEGR(FM) Channel 274C1 60 dBu Service, Present and Proposed

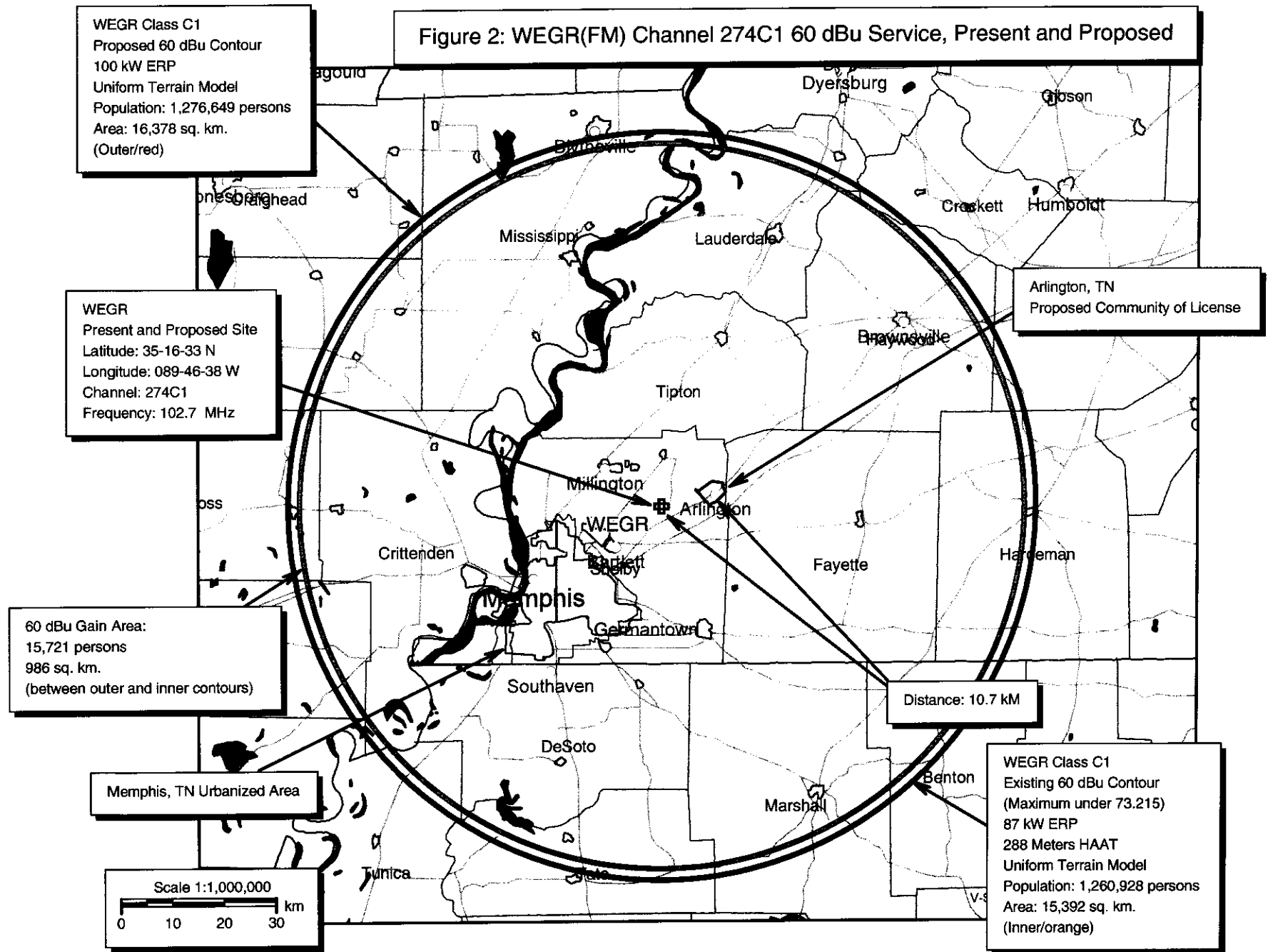


Figure 3: WEGR(FM) 274C1 70 dBu Service to Arlington, TN

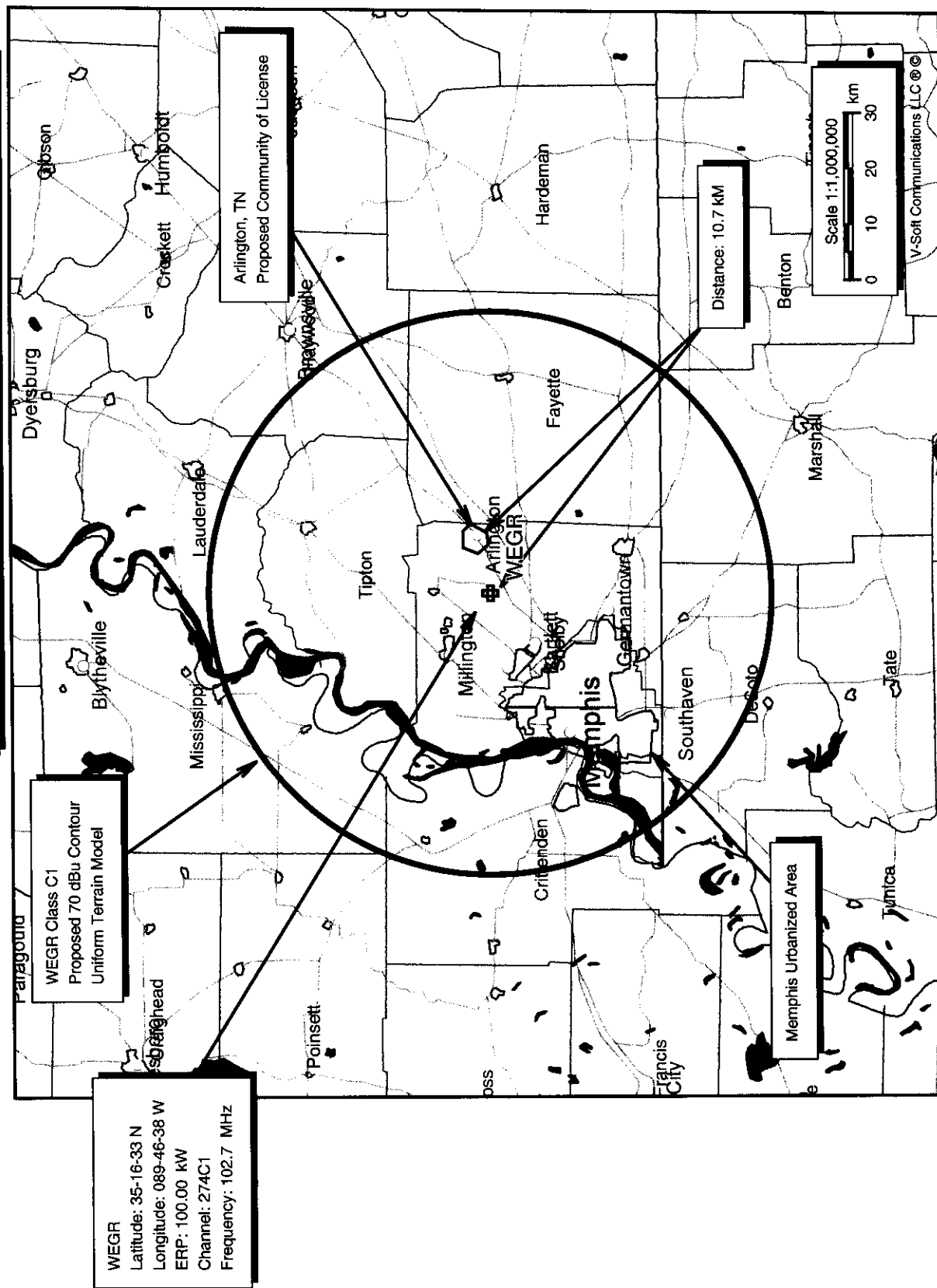


Figure 4: Channel 274 Class A 70 dBu Service to St. Florian, Alabama

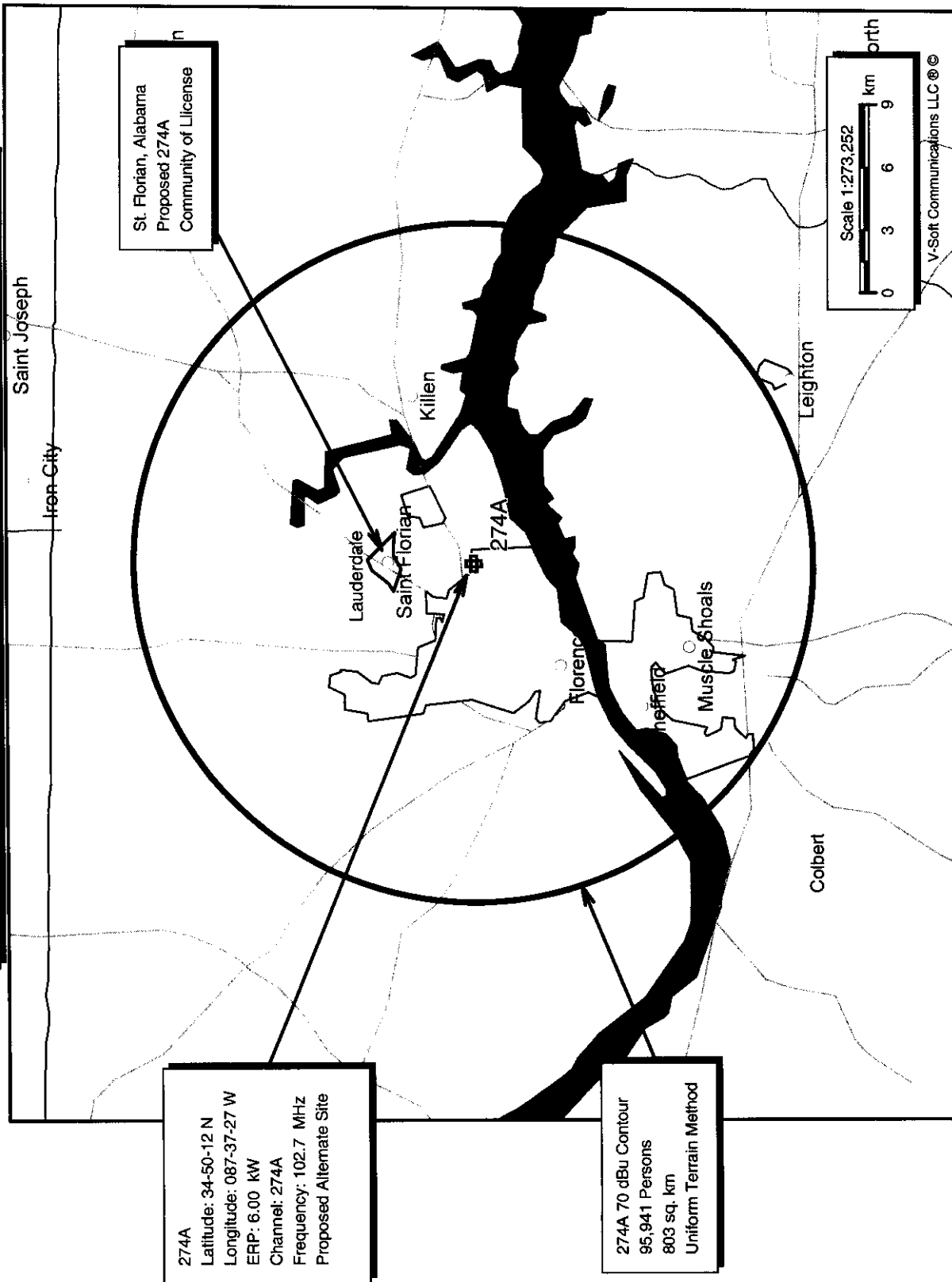
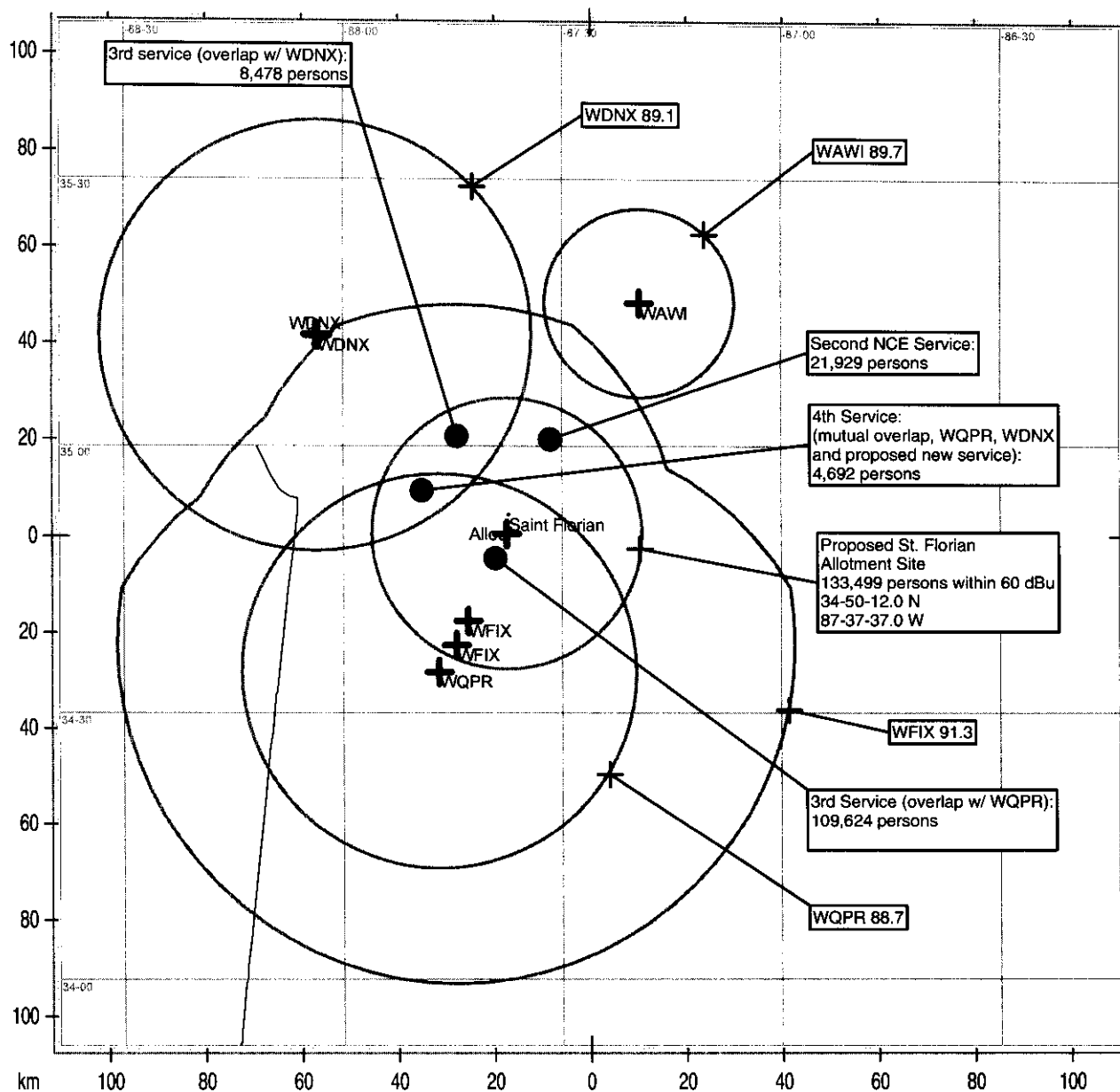


Figure 5: Channel 274A Allocations Spacing Study at St. Florian, Alabama

St Florian								
REFERENCE			CLASS = A			DISPLAY DATES		
34 50 12 N			Current			DATA 04-24-04		
87 37 27 W			Spacings			SEARCH 04-26-04		
----- Channel 274 - 102.7 MHz -----								
Call	Channel		Location		Dist	Azi	FCC	Margin
ALLO	VAC	274A	St. Florian	AL	13.19	346.4	115.0	-101.81
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.								
WEGR	LIC-N	274C1	Arlington	TN	202.37	284.6	200.0	2.37 ¹
ALLO	USE	274C1	Memphis	TN	205.14	281.4	200.0	5.14
Coordinates updated from LIC record BLH3596								
ALLO	USE	271C1	Decatur	AL	81.03	91.1	75.0	6.03
Coordinates updated from LIC record BLH860408KD								
ALLO	USE	275C1	La Vergne	TN	140.51	40.0	133.0	7.51
Coordinates updated from LIC record BLH890619KD								
ALLO	RSV	275C1	La Vergne	TN	140.51	40.0	133.0	7.51
WBUZ	LIC	275C1	La Vergne	TN	140.51	40.0	133.0	7.51
ALLO	VAC	275C3	Saltillo	MS	99.28	240.9	89.0	10.28
WDRM	LIC	271C1	Decatur	AL	91.01	92.8	75.0	16.01
ALLO	USE	273C1	Jasper	AL	150.25	172.0	133.0	17.25
ALLO	USE	273C1	Pegram	TN	153.67	7.9	133.0	20.67
ALLO	USE	276C3	Moulton	AL	63.87	131.9	42.0	21.87
To channel 276C3 per one-step application								
WEUPFM	LIC	276C3	Moulton	AL	63.87	131.9	42.0	21.87
WQZQFM	LIC-N	273C1	Pegram	TN	164.17	10.0	133.0	31.17
ALLO	RSV	273C1	Pegram	TN	164.29	9.4	133.0	31.29
WDXB	LIC	273C1	Jasper	AL	169.06	155.9	133.0	36.06
ALLO	USE	221A	Minor Hill	TN	50.84	51.3	10.0	40.84
Coordinates updated from LIC record BLH830922AB								
WEUZ	LIC-N	221A	Minor Hill	TN	50.84	51.3	10.0	40.84
WOWL	LIC-N	220C2	Burnsville	MS	72.60	278.4	15.0	57.60
WKDF	LIC	277C0	Nashville	TN	150.49	27.6	86.0	64.49
Downgraded due to lack of application filed for minimum Class C facility.								
ALLO	USE	277C0	Nashville	TN	150.49	27.6	86.0	64.49

¹ This instant proposal.

First and Second NCE Service, St. Florian Allotment (at alternate site proposed)



— State Borders

Lat/Lon Grid